

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 AUG 16 P 3:17

LORENZO GUARINO,
Plaintiff

V.

R.W. GRANGER & SONS, INC.,
Defendant

CIVIL NO. 04-10246

U.S. DISTRICT COURT
DISTRICT OF MASS

JLT

DEFENDANT'S RESPONSE TO DISCOVERY ORDER
OF MAY 25, 2004

DEFENDANT'S INITIAL DISCLOSURE

Defendant, R. W. Granger & Sons, Inc., by its attorney, Patrick M. McCormack, makes the following initial disclosures as required by Federal Rules of Civil Procedure 26(a)(1), local rule 26.2(A), 26.1(B) and deputy clerk of U.S. District Court, District of Massachusetts, Zita Lovett's discovery order of 5/25/04.

A. Individuals with discoverable information regarding plaintiff's claim.

1. The following individual is likely to have discoverable information regarding the defenses to the claim of the plaintiff:

Ernest O'Brien, President, R.W. Granger & Sons, Inc., 415 Boston Turnpike, Shrewsbury, MA 015454. Mr. O'Brien is the person most knowledgeable within the defendant corporation concerning the construction site where the plaintiff is alleged to have sustained injury.

B. Relevant document and tangible things.

The following records are supplied to the plaintiff:

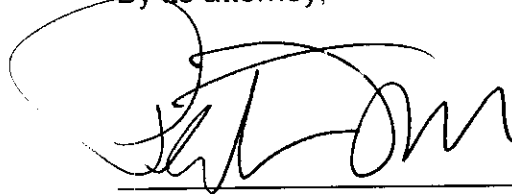
1. Certain Meeting Minutes taken of the general contractor/sub-contractor weekly meetings. The Meeting Minutes supplied are for the period immediately prior to the plaintiff's alleged accident. A complete copy of all Meeting Minutes may be viewed at the offices of R.W. Granger at a mutually convenient time.
2. R.W. Granger & Sons' Superintendent Daily Job reports for the period of time immediately preceding the plaintiff's alleged accident. A complete copy of the Superintendent's Daily Job reports may be viewed at the offices of R.W. Granger & Sons, Inc. at a mutually convenient time.

3. A copy of the sub-contract between R.W. Granger & Sons, Inc. and the plaintiff's employer, Fenestration Architectural Products, LLC as well as change orders thereto. A complete copy of all sub-contracts for the construction job in question may be viewed at the offices of R.W. Granger & Sons, Inc. at a mutually convenient time.

4. Insurance Agreements.

R. W. Granger & Sons, Inc. is insured by CNA Insurance Company with a policy limit of \$1,000,000.00. A copy of the insurance policy may be viewed at the Law Office of Jacqueline L. Allen, 262 Washington Street, Boston, MA 02108 at a mutually convenient time.

By its attorney,

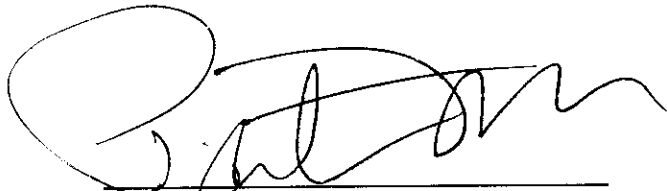


Patrick M. McCormack
B.B.O. No. 546194
Law Offices of Jacqueline L. Allen
262 Washington Street, Suite 601
Boston, MA 02108
617-878-4614

CERTIFICATE OF SERVICE

I, Patrick M. McCormack, attorney for the Defendant, R.W. Granger & Sons, Inc., in the above-entitled action, hereby certify that on the 13th day of August, 2004, I delivered a copy of the Defendant's Response to Discovery Order of 5/25/04, by hand to:

Frank C. Corso, Esq.
15 Court Square Suite 240
Boston, MA 02108



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